

**KRONENBERGER BURGOYNE, LLP**

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Attorneys for Defendant JUST THINK MEDIA

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

**NUTRICAP LABS, LLC,**

Plaintiff,

vs.

**JUST THINK MEDIA,**

Defendant.

Case No. 2:10-cv-01126-LDW -ARL

**NOTICE OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

TO: RAIMONDI LAW, P.C.  
Christopher A. Raimondi  
3280 Sunrise Highway, Suite 344  
Wantagh, New York 11793  
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PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate of Good Standing annexed thereto we will move this Court before the Honorable Leonard D. Wexler at the United States Courthouse for the Eastern District of New York, on the 28<sup>th</sup> day of May, 2010, or as soon thereafter as counsel can be heard, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, a member of the firm of Kronenberger Burgoyne, LLP and a member in good standing of the Bar of the State of New York as attorney pro hac vice to argue or try this case in whole or in part as counsel for Defendant Just Think

Media. There are no pending disciplinary proceedings against me in any State or Federal court.

Respectfully submitted,

DATED: May 13, 2010

**KRONENBERGER BURGOYNE, LLP**

By: 

Karl S. Kronenberger

Attorneys for Defendant,  
JUST THINK MEDIA

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
NUTRICAP LABS, LLC,

Plaintiff,

Case No. 2:10-cv-01126-LDW -ARL

vs.

JUST THINK MEDIA,

**AFFIRMATION OF  
DARA M. HARTMAN**

Defendant.

-----X

DARA M. HARTMAN, ESQ., an attorney admitted to practice in the State of New York, affirms the following under penalty of perjury:

1. I am an associate of the Law Offices of Andrew L. Crabtree, P.C., local counsel for defendant Just This Media, and as such, have personal knowledge of the facts and circumstances herein.

2. I submit this affirmation in support of the motion of Karl S. Kronenberger for admission to practice pro hac vice in the above captioned matter.

3. Mr. Kronenberger's previously filed motion was denied by this Court with leave to renew. In connection therewith, the Court required the submission of a Certificate of Good Standing from the State of New York and an explanation as to why the movant is seeking to appear pro hac vice if he is admitted in New York.

4. Attached hereto as Exhibit "A" is a copy of the prior motion, with the Affidavit of Karl S. Kronenberger and draft Order.

5. Attached hereto as Exhibit "B" is the Supplemental Affidavit of Karl S. Kronenberger, explaining why he is seeking to appear pro hac vice.

6. Attached hereto as Exhibit "C" are Certificates of Good Standing from each of the states in which Mr. Kronenberger is admitted to practice law, including California, Georgia, Ohio and New York.

WHEREFORE, it is respectfully requested that the Court grant the motion of Karl S. Kronenberger to appear pro hac vice in this action.

Dated: Melville, New York  
May 18, 2010

  
DARA M. HARTMAN